

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

In the Matter of the Application of)
)
PUBLIC UTILITIES COMMISSION)
)
Instituting a Proceeding to Investigate the)
Implementation of Feed-in Tariffs.)
)
_____)

DOCKET NO. 2008-0273

PUBLIC UTILITIES
COMMISSION

2009 MAR -4 P 1:29

FILED

**THE SOLAR ALLIANCE'S
INFORMATION REQUESTS TO HAWAIIAN ELECTRIC COMPANY AND
THE CONSUMER ADVOCATE REGARDING THEIR
OPENING STATEMENT OF POSITION AND PROPOSAL FOR FEED-IN TARIFF
DESIGN, POLICIES AND PRICING METHODS AND
TO THE DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT AND
TOURISM'S OPENING STATEMENT OF POSITION INCLUDING PROPOSALS FOR
FEED-IN TARIFFS DESIGNS, POLICIES, AND PRICING METHODS**

AND

CERTIFICATE OF SERVICE

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for The Solar Alliance

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

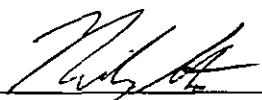
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Pursuant to the Commission's Order Approving the HECO Companies' Proposed
Procedural Order, as Modified, filed on January 20, 2009, The Solar Alliance hereby submits the
following Information Requests to the HECO Companies and the Division of Consumer
Advocacy, and the Department of Business, Economic Development and Tourism.

Respectfully submitted.

DATED: Honolulu, Hawaii, *March 4* 2009.



RILEY SAITO
for The Solar Alliance

DOCKET NO. 2008-0273

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METHODS**

INSTRUCTIONS:

In order to expedite and facilitate Solar Alliance's ("SA") review and analysis in the above matter, the following is requested:

1. For each response, the HECO Companies and the Consumer Advocate ("HECO/CA") and the Department of Business, Economic Development and Tourism ("DBEDT") should identify the person who is responsible for preparing the response as well as the witness who will be responsible for sponsoring the response should there be an evidentiary hearing;
2. Should HECO/CA and/or DBEDT claim that any information is not discoverable for any reason:
 - a. State all claimed privileges and objections to disclosure;
 - b. State all facts and reasons supporting each claimed privilege and objection;
 - c. State under what conditions HECO/CA and/or DBEDT is willing to permit disclosure to SA (e.g. protective agreement, review at business offices, etc.); and
 - d. If HECO/CA and/or DBEDT claims that a written document or electronic file is not discoverable, besides complying with subparagraphs 2a-c, identify each document or electronic file, or portions thereof, that HECO/CA and/or DBEDT claims are privileged or will not be disclosed, including the title or subject matter, the date, the author(s) and the addressee(s).

SA-IR-7 (to HECO): Does the HECO Companies plan to revise its Rule 14 to make it consistent with the intent of the HCEI and more user friendly for potential FiT generators?

- a. Specifically, does the HECO Companies plan to revise or eliminate Rule 14, Appendix I, Section 2. General Interconnection Guidelines d. Utility Feeder Penetration. This section has a ten percent feeder penetration which is inconsistent with the Hawaii Clean Energy Agreement and the "Location Value Maps" referenced in this section needs to be reevaluated.
- b. Please explain why it takes at least 6+, (exact time frame is not known since the current application is still ongoing), months to do an Interconnection Requirement Study at the 10% feeder distribution level. How will the HECO Companies address minimizing the extended IRS resolution timeframe at the low level of DG penetration and still achieve the objectives of the HCEI?. (HECO Companies have shown an inability to timely respond/process to the current IRS triggers in Rule 14.)
- c. With the lower level of 10% feeder distribution requiring a IRS evaluation, what are the plans, process, and timeline that the HECO Companies are willing to commit to in regards to the 15% ,(HCEI proposed), 12 kVa circuit penetration evaluation?
- d. Specifically, does the HECO Companies plan to revise or eliminate Rule 14, Section 3 Design Requirements, f. Supervisory control? (This requirement creates a "system size benchmark" which third party investors may not want to exceed, fearing additional costs, studies, remote curtailment.)

SA-IR-8 (to DBEDT, ref. SOP at 11): Please explain what size cap on the total installed capacity are you proposing to install on PV solar and why?

SA-IR-9 (to DBEDT, ref. SOP at 14): Please explain what data requirement and periodic reporting requirements you are proposing? What would be the time frame on your proposed periodic reporting requirements?

CERTIFICATE OF SERVICE

The foregoing Information Request to Hawaiian Electric Company and the Consumer Advocate, and the Department of Business, Economic Development and Tourism were served on the date of filing by hand delivery or electronically transmitted to the following Parties:

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DATED: Honolulu, Hawaii, *March 4* 2009.



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